

Exhibit 2

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: INSULIN PRICING
LITIGATION**

Case No. 2:23-md-3080 (BRM)(RLS)
MDL No. 3080

This Document Relates to:

The State of Louisiana

**PLAINTIFF STATE OF LOUISIANA'S AMENDED INITIAL DISCLOSURES
PURSUANT FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)**

Plaintiff State of Louisiana ("the State") discloses the following information required by Fed. R. Civ. Proc. 26(a)(1).

Reservation of Rights and Objections

By making these disclosures, the State does not represent that it identified every document or witness that it will use to prove the claims at issue in this lawsuit. Rather, this disclosure represents a good faith effort to identify information that it reasonably believes at this time that it may use to support its claims or defenses, as required by Rule 26(a)(1). As of the date of these disclosures, the State has not had sufficient opportunity to identify and review all documents and otherwise collect all information that may be pertinent to the subject matter of this proceeding. It continues its investigation into the claims herein and makes these disclosures based solely on information identified by it to date. Thus, the State reserves its right to supplement and amend these disclosures pursuant to Fed. R. Civ. Proc. 26(e).

The State does not waive its rights to object to production of any document or tangible thing disclosed herein on the basis of privilege, the work product doctrine, relevance, undue burden, or any other valid objection. Nor does it waive its right to object to any discovery request

or demand. The State further reserves any and all objections to the discovery, use, or admissibility of any information disclosed below.

A. Fed. R. Civ. Proc. 26(a)(1)(A)(i): Individuals Now Known to be Likely to Have Discoverable Information that the State May Use to Support Its Claims or Defenses, Unless Solely for Impeachment:

The State adopts and incorporates by reference the information disclosed and served by the parties in this MDL proceeding.

In addition, the following individuals and entities may have information which the State may use to support its claims:

NAME & TITLE	CONTACT INFORMATION	SUBJECT AREA
Current employee(s) of the Louisiana Department of Health	Through undersigned counsel	State Medicaid
Susan Fontenot, Louisiana Department of Health, Pharmacist	Through undersigned counsel	State Medicaid
Mitzi Hochheiser, Louisiana Department of Health, Medicaid Deputy Director, Digital Services, Data and Systems	Through undersigned counsel	State Medicaid
Teresa Bravo, Louisiana Department of Health, Medicaid Program Manager	Through undersigned counsel	State Medicaid
Current employee(s) of the Office of Group Benefits	Through undersigned counsel.	State employee benefits
Cara DeLee, Group Benefits Administrator and Director, Office of Group Benefits	Through undersigned counsel	State employee benefits
Kristen Hardy, Group Benefits Analyst, Manager and Director	Through undersigned counsel	State employee benefits
Demetrice Johnson, Group Benefits Manager and Analyst	Through undersigned counsel	State employee benefits

Sam Blount, Contracts Monitor, Group Benefits Administrator	Through undersigned counsel	State employee benefits
Current and former employees of Sanofi-Aventis U.S., LLC	Should be contacted through appropriate counsel	Insulin pricing and PBM formulary placement
Current and former employees of Novo Nordisk, Inc.	Should be contacted through appropriate counsel	Insulin pricing and PBM formulary placement
Current and former employees of CaremarkPCS Health, LLC	Should be contacted through appropriate counsel	Insulin pricing and PBM formulary placement
Current and former employees of Express Scripts Administrators, LLC d/b/a Express Scripts	Should be contacted through appropriate counsel	Insulin pricing and PBM formulary placement
Current and former employees of CVS Health Corp	Should be contacted through appropriate counsel	Insulin pricing and PBM formulary placement
Current and former employees of OptumRX, Inc.	Should be contacted through appropriate counsel	Insulin pricing and PBM formulary placement
Current and former employees of Eli Lilly and Co.	Should be contacted through appropriate counsel	Insulin pricing and PBM formulary placement
Any person disclosed by Sanofi-Aventis U.S., LLC	Should be contacted through appropriate counsel	Such subject area(s) as are appropriate
Any person disclosed by Novo Nordisk, Inc	Should be contacted through appropriate counsel	Such subject area(s) as are appropriate
Any person disclosed by CaremarkPCS Health, LLC	Should be contacted through appropriate counsel	Such subject area(s) as are appropriate
Any person disclosed by Express Scripts Administrators, LLC d/b/a Express Scripts	Should be contacted through appropriate counsel	Such subject area(s) as are appropriate
Any person disclosed by CVS Health Corp	Should be contacted through appropriate counsel	Such subject area(s) as are appropriate
Any person disclosed by OptumRX, Inc.	Should be contacted through appropriate counsel	Such subject area(s) as are appropriate
Any person disclosed by Eli Lilly and Co.	Should be contacted through appropriate counsel	Such subject area(s) as are appropriate
Any person disclosed by any other party to the MDL	Should be contacted through appropriate counsel	Such subject area(s) as are appropriate
Any expert witnesses who may be disclosed by any party	Should be contacted through appropriate counsel	Such subject area(s) as are appropriate

B. Fed. R. Civ. Proc. 26(a)(1)(A)(ii): A Description of Documents, Electronically Stored Information, and Tangible Things in the Possession, Custody, or Control of the State Which May be Used to Support Claims or Defenses

The State adopts and incorporates by reference the information disclosed and served by parties in this MDL proceeding.

The State discloses that it possesses documents and other information produced by Defendant(s) and others in state pre-suit discovery and will use such information to prove its claims.

Furthermore, the State intends to rely on publicly available information, including but not limited to information obtained from Congressional inquiries into insulin pricing, news reports, press releases, and other disclosures regarding insulin pricing.

C. Fed. R. Civ. Proc. 26(a)(1)(A)(iii): Computation of Damages

The State seeks damages, civil penalties, disgorgement, attorneys' fees, and costs. At this stage of the case, it is impossible to compute an appropriate damages, penalties, or disgorgement amount. The State anticipates that such damages will be computed with econometric and other accepted tools of economic analysis used by experts. This will require expert testimony and will be addressed in connection with expert disclosures at the time provided in the Scheduling Order.

D. Fed. R. Civ. Proc. 26(a)(1)(A)(iv): Insurance Agreements

Not applicable.

Dated: October 7, 2024

**ELIZABETH B. MURRILL
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/s/ John Alden Meade
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CERTIFICATE OF SERVICE

I certify that I am admitted *pro hac vice* to this Court and am an attorney licensed in the State of Louisiana, and that on this date I caused a copy of this document to be served on the counsel of record in the above captioned matter via electronic mail.

/s/ John Alden Meade
John Alden Meade

October 7, 2024